



# PRIVACY POLICY

Last updated: December 4, 2024

# Privacy Policy

---

SCI Lease Corp. (“**SCI**”, “**we**”, “**our**”, “**us**”) recognizes the importance of your right to privacy and wants you to be familiar with how we collect, use, disclose, keep and destroy any personal information that individually identifies you and our commitment to meet our obligations under applicable Canadian privacy laws.

This Privacy Policy explains how we collect, use, disclose, keep, destroy and protect your personal information when you use our website or mobile site (collectively, the “**Site**”) and our services, including our motor vehicle leasing services (collectively, the “**Services**”). It also explains how you can contact us if you have questions about how we handle your information, if you want to make a complaint regarding the protection of your personal information and if you want to exercise your rights. We will only collect, use, disclose, keep and destroy your personal information in accordance with this Privacy Policy.

Depending on the Service, we may provide additional or different privacy notices for specific relations you have with us or to highlight how we use your personal information for specific Services (collectively, the “**Services Documentation**”). Where we do this, it will be clear which notices apply to which relations and Services.

By using our Site and Services and supplying your personal information, you acknowledge that you have read and understood this Privacy Policy, and you agree and consent to the collection, use, disclosure, keeping, destruction, and other processing of your personal information as outlined in this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use our Site or Services or supply your personal information to us.

## 1. What Personal Information do we collect?

---

Personal information means any information about an identifiable individual. De-identified data means data that is not associated with or linked to any individual’s personal information or will not easily permit the identification of individuals (“**De-identified Data**”). Anonymous data means data that, in accordance with generally accepted best practice and in all foreseeable circumstances, no longer makes it possible to identify the individual directly or indirectly (“**Anonymous Data**”). SCI does not consider personal information to include Anonymous Data.

The types of personal information that we may collect includes, but is not limited to:

- Contact information such as your name, postal address, e-mail address and telephone number;
- Information we receive from you in connection with your application for credit, including employment information and your income, information regarding your debts and expenses, home rental or ownership information and the amount of your rental or mortgage payments, date of birth, financial institution information, and other information to assist in obtaining a credit report;
- Your driver’s license information;
- Banking information, including your account number and other information needed for pre-authorized payments;
- Information and documents to help us verify your identity;
- Information regarding the vehicle that you lease or propose to lease and in connection with your lease or proposed lease transaction, including your payment history and geolocation data;
- Information we obtain about you from credit reporting agencies;
- Your IP address; and
- Personal information you give us that we did not request (such as personal information you voluntarily put into an email to us).

You are not required to provide us with your social insurance number (“**SIN**”). However, if you do provide your SIN to us, with your consent, we may use your SIN as a unique identifier to ensure that the credit information we are requesting is about you, rather than someone else with the same or similar name.

## 2. Purposes for Collecting Your Personal Information

---

We may collect, use and disclose your personal information in order to provide you with our Services. We also collect, use and disclose your personal information to comply with legal and regulatory requirements and as otherwise may be permitted or required by applicable laws. We will only use the personal information that we collect for the purposes for which it was collected. We collect your personal information for the following purposes and in accordance with applicable laws:

- to provide you with our Services, as more fully described in your Services Documentation, which may include:
  - to evaluate your credit application and ongoing creditworthiness and solvency;
  - to enter into a lease with you;
  - to publish, manage, administer, collect amounts owing under, ensure compliance with and enforce any such lease;
  - to respond to your inquiries regarding any credit application and any resulting lease;
  - to verify and confirm your identity and coordinates;
  - to establish and maintain commercial relations with you, including responding to your questions regarding our Services;
  - to manage, if applicable, our lease program with vehicle manufacturers;
  - to maintain and follow up on warranty, maintenance, recall campaigns, insurance and customer service records;
- to respond to questions that you send by email or through our Site;
- subject to applicable law, to notify you about other services, offers, advertisements, updates and events provided by SCI, which may be of interest to you;
- to customize the appearance of the Site displayed to you;
- to obtain your feedback regarding our Site and Services, including our surveys;
- to track behavioral information on the Site to serve similar content upon future visits;
- to support our business functions such as internal business processes, fraud prevention and detection, maintenance of quality service levels, staff training, marketing and advertising;
- to generate De-Identified Data and use it for study or research purposes or for the production of statistics, if necessary;
- for other consistent, or clearly for your benefit, purposes; and
- to meet any legal or regulatory requirements.

## 3. When and How Do We Collect Personal Information?

---

We may collect your personal information when you voluntarily provide it to us by using our Site and Services or from third party sources. For example, we may ask you to provide personal information if you:

- use our Site and our Services;
- register, update or create an account on our Site and our Services;
- sign into your account;
- call into a call centre;
- send us a question or comment by email or phone;
- post comments or other content on our Site and our Services;
- register to receive newsletters, articles, and updates about our Services; and
- otherwise participate in features of our Site and our Services that ask for personal information.

We may receive personal information about you from the third party sources described in your Services Documentation, such as credit reporting agencies, and from SCI Ltd. d.b.a. SCI Technologies Ltd. We use this information to: (i) assist with our business operations; and (ii) provide our Services. By using our Site and Services, you authorize the collection of your personal information from these sources and, if applicable, you authorize these sources to give us your personal information for the above-mentioned purposes.

If you speak with one of our representatives by telephone, the call may be recorded or monitored. We do this for the following reasons:

- To establish a record of the information that you provide;
- To take or verify instructions from you;
- To confirm your identity;
- To maintain quality service levels; and
- To assist in staff training.

## 4. Limiting Collection of Personal Information

---

We limit the collection of personal information to that which is necessary to fulfill the purposes identified in this Privacy Policy and we collect, use, and disclose your personal information only in accordance with this Privacy Policy.

## 5. Use, Disclosure and Retention of Personal Information

---

Your personal information will not be used without your consent for purposes other than those for which it was collected or in accordance with applicable laws. We have adopted practices to define the roles and responsibilities of our employees with respect to your personal information and to limit their access to personal information to those cases where it is needed for the performance of their duties. From time to time, we may wish to use personal information for new or additional purposes, in which case we will amend the Privacy Policy to include these new or additional purposes and will obtain your consent through your continued use of our Site and Services.

We may generate De-identified and Anonymous Data from personal information collected through the Site and Services by removing, in accordance with generally accepted best practices and regulations, information that makes the data personally identifiable to an individual. Such De-identified and Anonymous Data includes, but is not limited to, information we collect from your use of our Site and Services. We may use Anonymous Data and aggregated data for any serious and legitimate purpose subject to applicable laws and disclose such data to third parties in our sole discretion.

We retain your personal information only for as long as we need it to fulfill the purposes for which it was collected and to comply with our legal obligations. We have adopted practices to ensure that our employees are able to periodically identify information that needs to be destroyed, and the procedure for doing so.

We may also use and disclose your personal information to service providers, data processors and other third parties ("**Third Parties**") under the following limited circumstances:

- to Third Parties that assist with our operations and Site and Services including, without limitation, for customer services, our business operations, monitoring and analyzing Site activity, and operating and maintaining the Site. Such Third Parties may only use your personal information for the purposes described in this Privacy Policy;
- to Third Parties who assist in processing your lease application or administering your lease with us, including, without limitation, credit reporting bureaus, financial institutions, insurance companies, insurance brokers, vehicle manufacturers, motor vehicle dealers, government agencies, and persons to whom you have applied for credit;
- when necessary to protect our safety, property or other rights, our representatives, customers and users of the Site, including to detect and prevent fraud;

- if we sell or transfer all or a portion of our business or assets to a related company or a third party. Your personal information will remain subject to our pre-existing Privacy Policy unless you agree to the privacy policy of the company or third party that acquires your personal information;
- with your consent; or
- as otherwise required or permitted by law.

Your personal information may be transferred to a third party or parties to be used for the same purposes described herein if a lease agreement that you enter into with SCI is transferred or assigned to such third party or parties, or to an organization in connection with the due diligence for, and completion of, a business transaction, including, without limitation, a securitization or financing involving SCI or its subsidiaries or affiliates. If you enter into a lease agreement with us, with your consent, we may from time to time disclose details of your lease agreement, including payment history information, to credit reporting agencies, which may assist other lenders in assessing your creditworthiness.

## 6. Data Transfers

---

As discussed above, we may engage Third Parties to perform certain services on our behalf and to otherwise provide the Services. These Third Parties may store, process, and transfer personal information on servers located outside of the province it was originally collected and in jurisdictions whose data protection laws may differ from those of your province and of Canada, such as the United States of America. As a result, personal information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to the laws in those jurisdictions. For example, information may be shared in response to valid demands or requests from government authorities, courts, and law enforcement officials in those countries. Subject to applicable laws in such other jurisdictions, we will use reasonable efforts, including conducting Privacy Impact Assessments where necessary, to ensure that appropriate protections are in place to require our Third Parties to maintain protections on personal information that are equivalent to those that apply in Canada.

## 7. Links to Other Sites

---

Our Site may contain links to other sites that are independently owned and operated by third parties. These other sites may have their own privacy policies and are not governed by this Privacy Policy. We are not responsible for the privacy practices, or the content of any sites owned and operated by any third parties. Other sites may collect and treat information collected differently, so we encourage you to carefully read and review the privacy policy of each site you visit.

## 8. Cookies, Web Beacons and Other Similar Technology

---

As you interact with this Site and Services, we may use automatic data collection technology and services that record and collect information that identifies your computer, tracks your use of this Site and Services, and collects certain other information about you and your surfing habits. This data collection technology may include cookies, web beacons and other similar devices on this Site and Services to enhance functionality and navigation for our visitors.

A cookie is a small data file that is placed on the hard drive of your computer so that your computer will “remember” information when you visit a site. Web beacons and tags are small strings of code that are used in conjunction with a cookie and allow us to record activity on our Site. Internet tags, graphic tags and similar web beacon type functions allow us to count the number of users who have visited a particular web page or to access certain cookies. We may use web beacons on this Site to count users and to recognize users by accessing our cookies. Being able to access our cookies allows us to personalize this Site and improve your experience at our Site. We may also include web beacons in HTML-formatted e-mail messages that we send to determine which e-mail messages were opened. Information tracked through these mechanisms includes but is not limited to: (i) your IP address; (ii) the type of web browser and operating system being used; (iii) the pages of the Site a user visits; and (iv) other sites a user visited before visiting our Site.

We may also employ cookies and action tags (also known as single pixel gifs or web beacons) to collect information about your use of, and activities on, our Site for our use but also for use by third parties that serve advertisements about SCI on other sites you may visit. In addition to the information about your visits to our Site, Third Parties may also use the information about your visits to other sites to target advertisements for services available from SCI.

You can set your internet browser up so that you are notified when cookies are stored, you can decide in each individual case whether you want to accept cookies, or you can refuse to accept any cookies. However, if you do not accept cookies, you may be restricted in how you are able to use our Site. You can delete cookies that are already stored on your hard disk at any time. You will find more details on how to do this in the operating guide for your Internet browser program. When required by the laws of your province or territory, the privacy settings of our Site ensure by default that those settings provide the highest level of confidentiality by default, without any intervention, except for browser cookies.

As described above, you may be able to set your browser to refuse cookies. If you refuse cookies, you may still receive online advertising, but it may be less personalized.

## 9. Third Party Analytics

---

Our Site uses third party analytics services such as Google Analytics, a web analytics service of Google. Google Analytics uses cookies to analyze how you use our Site. The information generated by the cookie about your use of our Site (including your IP address) is sent to a Google server in the U.S. and stored there. Google will use this information to evaluate your use of our Site, compile reports on Site activity for our Site operators and to provide other site activity related internet services. Additionally, Google may transfer this information to a third party when required by law or in the case of a third party processing information on Google's behalf. In no case will Google use your IP address in connection with any other information held by Google. You can set your internet browser to prohibit the installation of cookies, although we must point out that some features and functions of our Site will then be unusable. By using our Site, you consent to the processing of data about you collected by Google in the manner described and for the above-mentioned purpose. The consent for collection and storage of data can be withdrawn at any time in the future by clicking on the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>. Given the debate concerning the use of analytical tools using full IP addresses, we wish to point out that our Site uses the "Anonymize IP" function of Google Analytics that works with a shortened form of IP addresses to avoid direct personal identification.

We also use the cookies to carry out frequency assessments, page usage assessments and marketing assessments. For these assessments, we use this cookie information without a link to your personal information, so it is completely anonymous.

## 10. Security

---

We maintain reasonable technical, physical, and administrative security safeguards to protect your personal information against loss, theft, and unauthorized access, use and communication of personal information (collectively, a "**Confidentiality Incident**"). Any personal information that you provide to us is exchanged on a secured server. We assess the privacy risk of our electronic systems when necessary or required by law. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we are committed to protecting your personal information, we cannot ensure or warrant the security of any information you provide to us.

We take reasonable steps to verify your identity before granting you access to your account on our Site; however, you are solely responsible for maintaining the secrecy of your username, password, and any other account information. We also take reasonable steps to ensure that our employees are aware of the importance of maintaining the confidentiality of personal information and that unauthorized persons do not gain access to personal information that we have disposed of or destroyed.

If, despite our best efforts, a Confidentiality Incident occurs, we will take reasonable steps to reduce the risk of harm and to prevent further incidents of a similar nature, and we will notify you where required by law.

## 11. Rights and complaints

---

All requests must be made in writing by the person concerned or by their authorized legal representative at the contact information set forth below and we will need to verify your identity before processing your request. If your request is not sufficiently precise or if you require it, we will assist you in identifying the information sought. We will respond within the time periods provided for under applicable laws.

**Access:** You may request access to your personal information which we may hold about you. There is no cost for such access request unless you require copies of records. We may not be able to provide you with access to your personal information if the information cannot be separated from the personal information of others, cannot be disclosed for reasons of security or commercial confidentiality, or is protected by legal privilege. If we cannot provide you with access to your personal information, we will advise you of the reasons access is being denied, unless we are prohibited by law from doing so.

**Correction:** You may request to update and change your personal information when it is inaccurate, incomplete or equivocal. Where appropriate, the amended information will be transmitted to third parties having access to such information.

**Erasure:** You may request us to delete, destroy or remove your personal information if it is obsolete or no longer necessary for the purposes for which it was collected or for which you have given your consent, subject to retention periods provided by applicable laws.

**Complaints:** You may make a complaint about our security measures, our compliance with the laws or if you suspect the occurrence of a confidentiality incident. We have put in place procedures to manage and react to your complaint quickly and efficiently.

**Withdrawal of consent:** Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the purposes identified in this Privacy Policy at any time. If you refuse or withdraw your consent, you acknowledge that we may not be able to provide you or continue to provide you with certain services or information that may be of value to you. However, you may not be permitted to withdraw your consent to certain necessary collections, uses and disclosures of your personal information (for example, SCI needs to maintain reasonable business and transaction records). Your consent for Marketing Purposes may always be withdrawn at any time.

## 12. Electronic Communications

---

As part of signing up to receive the Services, you may have also opted in to receive email communications from us. If you opt-in to receive such communications, we may use the information to: communicate with you regarding our products, Services and promotions; provide you with other information that you request; and/or improve our product and service offerings.

You will always have the opportunity to "unsubscribe" from receiving any of our e-mail or other communications at any time and we will ensure that our e-mails include instructions on how to unsubscribe if you no longer wish to receive future e-mails from us. We provide an ongoing opportunity to unsubscribe or opt-out of contact by us by accessing our Site or by e-mail to [privacy@scileasecorp.com](mailto:privacy@scileasecorp.com).

If you decide to unsubscribe, we will only contact you (i) for the purposes allowed under applicable law; (ii) to send you notices of changes to our Privacy Policy; or (iii) send you Service related messages.

## 13. Changes to this Privacy Policy

---

We reserve the right to change or replace this Privacy Policy at our sole discretion at any time. Please check back from time to time to ensure that you are aware of any updates or changes in this Privacy Policy. We will post the most current version on our Site, and we will indicate at the top of this page the date this Privacy Policy was last revised. Your continued access or use of this Site after any such changes constitutes your acceptance of the Privacy Policy as revised.

## 14. Your Consent to the Terms of this Privacy Policy

---

By using our Services and providing us with your personal information, you agree that SCI may collect your personal information and you voluntarily consent to the collection, use, disclosure, and transfer of your personal information in accordance with this Privacy Policy and with the Services Documentation applicable to your situation. If you do not agree with any terms of this Privacy Policy, please do not use our Site or our Services or provide us with any personal information. If you do not understand the nature, purpose, and consequences of us collecting, using and disclosing your personal information, please do not use our Site or our Services or provide us with any personal information, and contact us at the contact information set forth below so that we can address your questions or concerns.

## 15. How to Contact Us

---

We welcome your feedback. If you have questions, comments, or concerns about this Privacy Policy, or would like to do any of the following:

- see your personal information that you have already sent us so that you can correct, update or delete it from our files;
- submit a written request to exercise any of your rights or obtain assistance in doing so;
- if your child under 13 has used this Site and sent us personal information, delete that personal information from our files;
- ask that we not send you electronic communications or otherwise contact you; or
- report any violation of this Privacy Policy or any suspected Confidentiality Incident,

Please contact our Privacy Officer at [privacy@scileasecorp.com](mailto:privacy@scileasecorp.com) and we will endeavor to get back to you promptly. Our Privacy Officer oversees our privacy policies and procedures and information-handling practices.